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VIA E-FILING

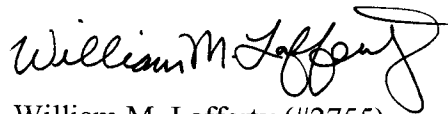
The Honorable Joseph J. Farnan
United States District Court
District of Delaware
844 King Street
Wilmington, Delaware 19801

Re: *Townes v. TransUnion LLC, et al, C.A. No. 04-1488 JJF*

Dear Judge Farnan:

Pursuant to Your Honor's November 2, 2005 letter to counsel, enclosed is a copy of the parties' Proposed Joint Rule 16 Scheduling Order, all terms of which have been agreed to by counsel. However, the parties wish to note and explain the proposed schedule with regard to summary judgment motions, which we recognize represents a departure from Your Honor's Memorandum Order regarding the briefing and submission of such motions. The parties are in agreement in their belief that there may be significant issues in this case that may be determined as a matter of law. For this reason, the parties have proposed a schedule which combines substantive briefing on summary judgment motions with the exchange of Statements and Counter-Statements of material facts in order to better define the overall schedule for this litigation. Of course, if Your Honor has any concerns or questions about the foregoing, counsel for the parties will make themselves available at the convenience of the Court to address them.

Respectfully,



William M. Lafferty (#2755)

cc. Clerk, U.S. District Court
Ralph N. Sianni, Esquire
Brad Friedman, Esquire
Michael L. McGlamry, Esquire
Beth Parr, Esquire